

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :: Hon. Jose L. Linares
vs. :: Criminal No. 10-83 (JLL)
L. HARVEY SMITH :: Trial: Nov. 29, 2010
::

Pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, defendant L. Harvey Smith respectfully requests that in addition to the questions proposed by the government, the following questions be asked of prospective jurors. If prospective juror answers yes to any of the questions, it is requested that the Court inquire further at sidebar.

DEFENDANT'S PROPOSED ADDITIONAL QUESTIONS

1. Do you have any personal knowledge of the facts or charges in this case?
2. Have you ever contributed to a political campaign in excess of \$100?
3. Do you have any bias or reason that would prevent you from deciding if the U.S. government induced someone to commit a criminal act?
4. Is there anything about the fact that this case involves charges against an elected official that leads you to believe you cannot be fair and impartial?
5. During the course of this trial, you might have to decide and evaluate government conduct. Can you do so without any prior bias or prejudice?
6. Have you or a close friend or family member ever worked for the Federal Bureau of Investigation, the United States Attorney's Office, the Attorney General's Office, or any local prosecutor's office or other state or federal agency?

7. Are you willing to consider conduct of the government in facilitating and inducing a criminal act when determining innocence or guilt?

Dated: Jersey City, NJ
November 16, 2010

Respectfully submitted,
/s/ Peter Willis

PETER R. WILLIS